

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SCOTT FLORCSK,)	
)	
Plaintiff,)	
)	C.A. No. 22-1230-CFC
v.)	
)	JURY TRIAL DEMANDED
UNSTOPPABLE DOMAINS INC.,)	
)	
Defendant.)	

**SCOTT FLORCSK’S MOTION FOR LEAVE TO
FILE SECOND AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a)(2), and timely on the Court’s deadline to move for leave to amend the pleadings (D.I. 31, ¶ 2), Plaintiff Scott Florcsk (“Florcsk”) respectfully moves for leave to file a Second Amended Complaint. The grounds for this motion are set forth in Mr. Florcsk’s Opening Brief and supporting papers filed herewith.

Pursuant to D. Del. LR 15.1, attached hereto is a copy of Mr. Florcsk’s proposed Second Amended Complaint (Exhibit A) and a redline comparison between Mr. Florcsk’s Second Amended Complaint and the First Amended Complaint (D.I. 114) (Exhibit B). A proposed order, with signature, is also attached.

Respectfully submitted,
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